

177508
SA.

WILLOUGHBY & HOEFER, P.A.

ATTORNEYS & COUNSELORS AT LAW
1022 CALHOUN STREET (SUITE 302)
P.O. BOX 8416
COLUMBIA, SOUTH CAROLINA 29202-8416

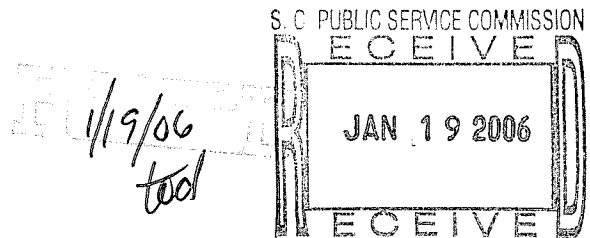
MITCHELL M. WILLOUGHBY
JOHN M.S. HOEFER
ELIZABETH ZECK*
PAIGE J. GOSSETT
RANDOLPH R. LOWELL
K. CHAD BURGESS
NOAH M. HICKS II**
M. McMULLEN TAYLOR

AREA CODE 803
TELEPHONE 252-3300
TELECOPIER 256-8062

January 17, 2006

*ALSO ADMITTED IN TX
**ALSO ADMITTED IN VA

The Honorable Charles L. A. Terreni
Chief Clerk / Administrator
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211



RE: Application of Palmetto Utility Protection Services, Inc. for
Implementation of 811 Abbreviated Dialing Code in Compliance
with the Federal Pipeline Safety Improvement Act and order of the
Federal Communications Commission; Docket Number 2005-390-C

Dear Mr. Terreni:

Enclosed for filing are the original and five (5) copies of Petition to Intervene of Cellco Partnership d/b/a Verizon Wireless in the above-referenced docket. By copy of this letter, I am serving all parties of record and enclose my certificate of service to that effect.

I would appreciate your acknowledging receipt of this document by date-stamping the extra copy that is enclosed and returning it to me in the enclosed self-addressed envelope. If you have any questions, or need additional information, please do not hesitate to contact us. *[Handwritten initials]*

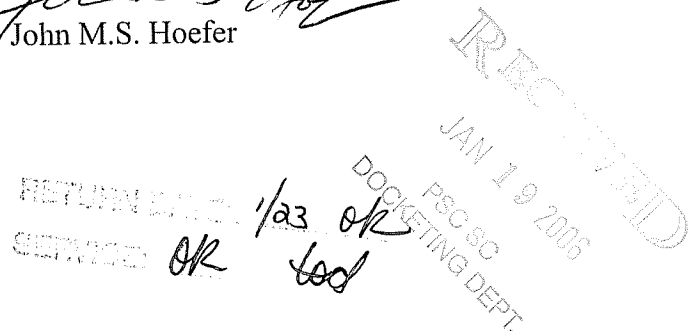
Sincerely,

WILLOUGHBY & HOEFER, P.A.

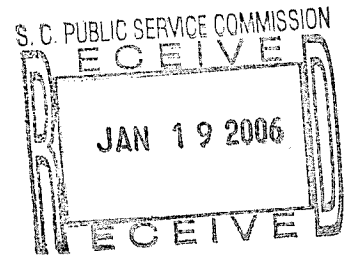
[Handwritten signature of John M.S. Hoefer]
John M.S. Hoefer

JMSH/twb
Enclosures

cc: Florence P. Belser, Esquire
Nanette S. Edwards, Esquire
Ms. Rhonda Dotman
Frank R. Ellerbe, III, Esquire
Bonnie D. Shealy, Esquire



BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2005-390-C



Re: Application of Palmetto Utility)
Protection Services, Inc. for)
Implementation of 811)
Abbreviated Dialing Code in)
Compliance with the Federal)
Pipeline Safety Improvement Act)
and order of the Federal)
Communications Commission)
_____)

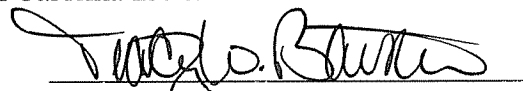
CERTIFICATE OF SERVICE

This is to certify that I have caused to be served this day one (1) copy of **Petition to Intervene of Cellco Partnership d/b/a Verizon Wireless** by placing same in the care and custody of the United States Postal Service with first class postage affixed thereto and addressed as follows:

Florence P. Belser, Esquire
Nanette S. Edwards, Esquire
Office of Regulatory Staff
Post Office Box 11263
Columbia, South Carolina 29211

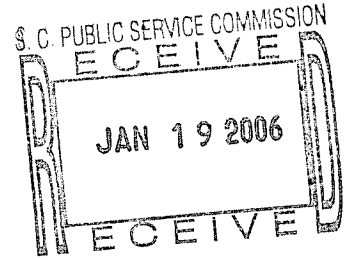
Ms. Rhonda Dotman
Palmetto Utility Protection Service, Inc.
810 Dutch Square Blvd, Suite 320
Columbia, South Carolina 29210

Frank R. Ellerbe, III, Esquire
Bonnie D. Shealy, Esquire
Robinson, McFadden & Moore, P.C.
Post Office Box 944
Columbia, South Carolina 29202


Tracy W. Barnes

Columbia, South Carolina
This 17th day of January, 2006.

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2005-390-C



Re: Application of Palmetto Utility)
 Protection Services, Inc. for)
 Implementation of 811)
 Abbreviated Dialing Code in)
 Compliance with the Federal)
 Pipeline Safety Improvement Act)
 and order of the Federal)
 Communications Commission)
_____)

PETITION TO INTERVENE OF
CELLCO PARTNERSHIP d/b/a
VERIZON WIRELESS

CELLCO Partnership, d/b/a Verizon Wireless (“Verizon Wireless”), hereby petitions pursuant, to 26 S.C. Code Ann. Regs. 103-836A(3) (1976) and other applicable rules and regulations of the Commission, to intervene in the above-captioned proceeding, and in support thereof would respectfully show unto this Honorable Commission as follows:

1. Verizon Wireless is a commercial mobile radio service (“CMRS”) carrier operating wireless communications systems within the State of South Carolina. As such, Verizon Wireless is required under the Federal Communications Commission (“FCC”) Order in CC Docket No. 92-105, FCC No. 05-59 to route calls made in South Carolina to National Abbreviated Dialing Code 811 to the Applicant, Palmetto Utility Protections Services, Inc. (“PUPS”). PUPS is an affiliate of One Call Systems, International (“OCSI”). On December 21, 2005, OCSI and Verizon Wireless entered into an agreement for nationwide deployment of 811 abbreviated dialing. A copy of the agreement between Verizon Wireless and OCSI is attached hereto and incorporated herein by this reference as Exhibit “A.” Verizon Wireless therefore has an interest in this proceeding.

2. The authorized representatives of Verizon Wireless in this proceeding are the undersigned.

3. Verizon Wireless respectfully requests that it be recognized as an Intervenor in this proceeding to present its position in the above-captioned docket.

4. The participation of Verizon Wireless will assist the Commission in developing a full and fair record to address issues arising from this proceeding and is therefore consistent with the Commission's goal of full public participation on matters before it affecting the public interest.

5. The position of Verizon Wireless is that the relief requested should be granted subject, however, to the terms and conditions agreed to by OCSI on behalf of PUPS as set forth in Exhibit "A."

6. Verizon Wireless will require no more than one (1) hour for its presentation in this proceeding.

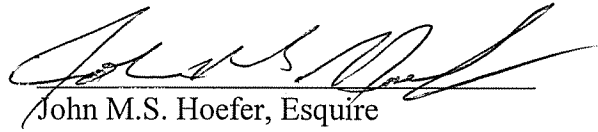
WHEREFORE Verizon Wireless respectfully requests:

A. That this Petition to intervene be granted and that it be allowed to intervene as a formal party of record in this proceeding;

B. That it be allowed full participation in this proceeding and to take such positions as it deems advisable, and

C. That such other and further relief be granted as is just and proper.

[SIGNATURE ON FOLLOWING PAGE]



John M.S. Hoefer, Esquire

WILLOUGHBY & HOEFER, P.A.

1022 Calhoun Street, Suite 320

Post Office Box 8416

Columbia, South Carolina 29202-8416

803-252-3300

jhoefer@willoughbyhoefer.com

Attorneys for Verizon Wireless

Columbia, South Carolina

This 17th day of January, 2006.



December 21, 2005

To Whom It May Concern:

One Call Systems, International, on behalf of the sixty-two One Call Centers in the United States, and Verizon Wireless, the nation's leading wireless provider, have agreed to deploy 811 abbreviated dialing throughout the country where Verizon Wireless provides wireless service. 811 will connect callers to state One Call notification systems for the purpose of providing advanced notice of excavation activities to underground facility operators in compliance with the Pipeline Safety Improvement Act of 2002 and the Federal Communications Commission's Order in CC Docket No. 92-105; FCC No 05-59 and appropriate state and local laws.

OCSI and VZW have agreed to a coordinated, national effort. This will avoid patchwork deployments and delays and will result in 811 being implemented quickly and efficiently throughout the Country, allowing 811 calls on Verizon Wireless' network to be quickly routed in most cases to the intended state one call center. OCSI and VZW have agreed to the following:

- OCSI accepts the responsibility for coordinating this implementation, including providing a current list of call centers, center coverage areas, and toll free and/or local free calling area numbers.
- OCSI will make sure that each call center is prepared to handle 811 calls forwarded to its center, or to transfer and/or redirect calls to adjacent call centers when wireless calls originate from areas outside of the state or the call center's area. This could be accomplished either by giving out the adjacent call center's number or transferring the caller, whatever the call center decides.
- VZW agrees to make its best effort to conform with the FCC order to route 811 calls to the call center serving the geographic area the call is initiated from, based on its switching system configuration.
- VZW will design 811 routing to best match up its switch coverage area to a call center area. Based on its switch coverage areas and state and/or call center boundaries VZW expects to be able to route the majority of calls to the intended call center in most cases.
- VZW and OCSI recognize that VZW's switch coverage areas will not match up exactly with state and/or call center boundaries and there will be cases where 811 calls will be routed from VZW's coverage areas outside the corresponding state and/or call center boundaries such that the calls will be routed to the wrong call center.

Since VZW and OCSI plan to implement 811 dialing in this manner throughout the country where Verizon Wireless provide wireless service, VZW will implement 811 dialing as described without contract and without charge. VZW plans to begin nationwide implementation in March 2006.

OCSI has reviewed the planned implementation described with all state One Call Centers and expects this letter to be shared by its members with state public utility commissions that might be considering 811 implementation matters to inform them of the plan.

OCSI thanks Verizon Wireless for stepping up to this public safety issue. The majority of One Call Centers are nonprofits that prevent needless damage to life and property as well as protecting critical service to their state consumers, businesses, public service, public safety, emergency services, and government.

A handwritten signature in cursive script that reads "William G. Kiger".

William G. Kiger
Co-Chair
One Call Systems International
412-464-7111

A handwritten signature in cursive script that reads "Francis Malnati, Jr.".

Francis Malnati, Jr.
Executive Director - Regulatory Matters
Verizon Wireless
908-306-7211